



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region IV**

Subject: **POLREP #10**
Completion of Excavation Activities
Burlington Industries Cheraw
B49F
Cheraw, SC
Latitude: 34.6977213 Longitude: -79.9146074

To: James Webster, USEPA R4 ERRPB

From: Matthew Huyser, On Scene Coordinator

Date: 11/6/2017

Reporting Period: 9/1/2017 - 11/1/2017

1. Introduction

1.1 Background

Site Number:	B49F	Contract Number:	
D.O. Number:		Action Memo Date:	7/13/2017
Response Authority:	CERCLA	Response Type:	Time-Critical
Response Lead:	EPA	Incident Category:	Removal Action
NPL Status:	Non NPL	Operable Unit:	
Mobilization Date:	6/5/2017	Start Date:	6/6/2017
Demob Date:	10/13/2017	Completion Date:	
CERCLIS ID:	SCN000404896	RCRIS ID:	
ERNS No.:		State Notification:	10/4/2016
FPN#:		Reimbursable Account #:	

1.1.1 Incident Category

Time-Critical Removal Action

1.1.2 Site Description

The South Carolina Department of Health and Environmental Control (DHEC) conducted sampling under a Preliminary Assessment (PA) and discovered the presence of Polychlorinated Biphenyls (PCBs) in residential and industrial surface soils near the former Burlington Industries facility, as well as in the drainage ditch and surface water corridor to the Pee Dee River. Public and private properties throughout the surface water corridor. An Action Memorandum for initial time-critical removal action was signed on April 25, 2017. Initial activities include cleanup to address at least six residential properties with concentrations of PCBs greater than 10 times the respective EPA Region 4 Removal Management Level (RML).

See Pollution Report (POLREP) #1 - Initial POLREP, dated June 7, 2017 for detailed information on this section.

1.1.2.1 Location

The former Burlington Industries facility is currently owned by Highland Industries, Inc. and is located at 650 Chesterfield Highway, Cheraw, Chesterfield County, South Carolina.

1.1.2.2 Description of Threat

Part 302.4 of Title 40 in the Code of Federal Regulations lists PCBs as a hazardous substance under section 102(a) of CERCLA, a toxic pollutant under section 307(a) of the CWA, and as a hazardous air pollutant under section 112 of the CAA. PCBs are also listed as a toxic chemical through section 313 of EPCRA and determined to present an unreasonable risk of injury to health and or the environment under section 2605(e) of the Toxic Substances Control Act (TSCA).

See Pollution Report (POLREP) #1 - Initial POLREP, dated June 7, 2017 for detailed information on this section.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

PCB Aroclors 1248 and 1254 were found throughout the Site with highest concentrations near the ditch at the west boundary of the former Burlington Industries facility, followed by decreasing concentrations throughout the surface water drainage corridor.

See Pollution Report (POLREP) #1 - Initial POLREP, dated June 7, 2017 for detailed information on this section.

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

ERRS temporarily demobilized from the Site on August 31 for a break during the Labor Day holiday weekend. Exposed tree roots in the excavation area at 601 Robin Hood Drive were covered with topsoil to preserve tree health.

ERRS remobilized on September 5 and resumed operations on September 6. Reexcavation was conducted in a segment of 601 Robin Hood Drive which did not meet the cleanup criteria of 1 ppm. Fill material was brought in to 601 Robin Hood and completed by September 8. Grading work was done at 224 Pecan Drive where excavation had been completed and backfilled between the fence and the ditch. Preparation for excavation began at 623 Robin Hood Drive with tree removal beginning on September 8.

In preparation for Hurricane Irma, crews demobilized on September 9 and remobilized to the Site on September 13.

On September 14, final repairs were completed at 224 Pecan Drive between the fence and the ditch to improve drainage. The area was seeded and a silt fence was installed. Sod installation at 224 and 228 Robin Hood was completed on September 15. 601 Robin Hood was prepared for sod on September 16 and completed on September 19.

Removal of trees and stumps from 623 Robin Hood Drive were completed by September 18. Excavation at 623 Robin Hood was completed on September 21 but an a second 6-inch lift was excavated from one segment where confirmation samples did not meet the cleanup criteria of 1 ppm. Final excavation at 623 Robin Hood was completed on September 25. Fill material was installed and replacement trees which had been removed were installed on September 27. Installation of sod was completed by September 29.

During previous sampling assessment activities by EPA and DHEC, observations were recorded of small pieces of green and/or grey "rubbery" material in surface soils near the former location of the wastewater sludge drying beds which had been operated and removed by Burlington Industries. No observations of significant accumulations or quantities of similar material were recorded by EPA or its contractors in excavation areas during the course of the removal action. On September 19, and at the direction of OSC Huyser, an attempt was made to determine if small pieces of similar material could be recovered from the surface of non-excavated areas at 601 Robin Hood Drive; a lawn detchatcher and lawn vacuum were operated concurrently on the yard. Visual observations of recovered material reported no recovery of objects which resembled the green/grey rubbery material believed to be associated with the drying beds. OSC Huyser determined that the continuing the operations on other properties would not likely yield different results.

Surfaces at the staging area for excavated soil were scraped and confirmation samples were collected. Confirmation sampling yielded one location that was slightly above the residential cleanup goal of 1 ppm. The location was re-scraped. Final disposal of nonhazardous waste soil from the staging area was completed on September 29.

Watering of sodded and seeded areas occurred daily until October 11. Final demobilization of remaining personnel and equipment occurred on October 13.

A continuous silt fence remains on all properties where backfill installation has been completed, to discourage migration of sediment from the ditch to the residential yard in the event that a flooding event occurs prior to remediation of contaminated soils in the ditch.

Cleanup criteria for residential soils were 1,000 ug/kg. All confirmation samples were forwarded to EPA Region 4 Scientific Support Section for consultation prior to backfilling.

2.1.2 Response Actions to Date

224 Pecan - Excavation, backfilling, and sod 100% complete.
228 Pecan - Excavation, backfilling, and sod 100% complete.
232 Pecan - Excavation, backfilling, and sod 100% complete.
234 Pecan - Excavation, backfilling, and sod 100% complete.
238 Pecan - Excavation, backfilling, and sod 100% complete.
244 Pecan - Excavation, backfilling, and sod 100% complete.
246 Pecan - Excavation, backfilling, and sod 100% complete.
248 Pecan - Excavation, backfilling, and sod 100% complete.
252 Pecan - Excavation, backfilling, and sod 100% complete.
254 Pecan - Excavation, backfilling, and sod 100% complete.
256 Pecan - Excavation, backfilling, and sod 100% complete.
260 Pecan - Excavation, backfilling, and sod 100% complete.
601 Robin Hood - Excavation, backfilling, and sod 100% complete.
623 Robin Hood - Excavation, backfilling, and sod 100% complete.

2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)

Enforcement and negotiation activities are ongoing

2.1.4 Progress Metrics

<i>Waste Stream</i>	<i>Medium</i>	<i>Quantity</i>	<i>Manifest #</i>	<i>Treatment</i>	<i>Disposal</i>
Brush		120.87 tons			Local Class II (C&D) Landfill
Non-TSCA Soil		5988.16 tons			Lee County Landfill, SC
TSCA PCB Soil		968.92 tons			Wayne Disposal #2 Landfill, MI and/or Heritage Landfill Roachdale, IN

2.2 Planning Section

2.2.1 Anticipated Activities

Through April of 2018, EPA will continue to monitor tree health in areas where excavation was conducted. Trees which die during that time as a result of EPA's excavation activities will be removed.

2.2.1.1 Planned Response Activities

- Excavate surface soils and contaminated with PCBs from residential properties which exceed the EPA RML; (ONGOING)
- Remove play units and sand from Huckleberry Park; (COMPLETE)
- Provide temporary staging of excavated PCB-contaminated soil/sediment between removal and disposal activities; (COMPLETE)
- Load and transport PCB-contaminated soil/sediment to an offsite location for treatment and/or disposal; (COMPLETE)
- Replace excavated soil with clean backfill and vegetation; and (COMPLETE)
- Restore impacted properties to the extent practicable. (ONGOING)

2.2.1.2 Next Steps

The Town of Cheraw will be posting steel signage at Huckleberry Park which will read "Park Closed Until Further Notice" and will then remove the yellow tape which has been surrounding the park. The town administrator discussed this change with EPA OSC Huyser.

A consent agreement has been signed between EPA and Highland Industries with an effective date of October 23, 2017. The scope of work under the agreement includes the Highland Industries property, cleanup activities in a segment of the ditch approximately 1900 feet long, and Huckleberry Park.

2.2.2 Issues

START is delineating and marking excavation areas based on digital maps and locations representing sample results from DHEC and EPA samples that were collected. Excavation is being conducted in 6-inch "lifts". EPA samples provide a higher density of sample location but lower accuracy at low concentrations. Composites of the EPA samples were sent for laboratory analysis to verify the screening method and provide way to generate a correction factor. The composites were created based on relative screening concentration and geographical location at the Site, thus the laboratory results also provide a description of the PCB concentration in the area represented by the composite. Interpretation of these results and translation to an excavation area is not simple and requires understanding of the source and limitations of the material. A report will be generated and submitted to the Site File which will document the method used for validation and interpretation.

2.3 Logistics Section

No information to report in this section

2.4 Finance Section

2.4.1 Narrative

The original action memorandum was signed on April 25, 2017 and a ceiling increase and change of scope action memorandum was signed on July 13, 2017. Funding has been provided for ERRS and START contracts in the amount represented in the table below.

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
ERRS - Cleanup Contractor	\$1,550,000.00	\$1,480,297.80	\$69,702.20	4.50%
TAT/START	\$75,000.00	\$71,000.00	\$4,000.00	5.33%
Intramural Costs				
Total Site Costs	\$1,625,000.00	\$1,551,297.80	\$73,702.20	4.54%

* The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The OSC does not necessarily receive specific figures on final payments made to any contractor(s). Other financial data which the OSC must rely upon may not be entirely up-to-date. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

2.5 Other Command Staff

2.5.1 Safety Officer

ERRS and START have each produced a HASP for their activities.

2.5.2 Liaison Officer

No information to report in this section

2.5.3 Information Officer

No information to report in this section

3. Participating Entities

3.1 Unified Command

No information to report in this section

3.2 Cooperating Agencies

Town of Cheraw
South Carolina DHEC

4. Personnel On Site

There are no personnel on Site.

5. Definition of Terms

No information to report in this section

6. Additional sources of information

6.1 Internet location of additional information/report

No information to report in this section

6.2 Reporting Schedule

POLREPs will be generated irregularly, following mobilizations to the Site to assess or respond to tree and vegetation health until the end of April , 2018.

7. Situational Reference Materials

No information to report in this section